

1 EVAN C. BORGES, State Bar No. 128706  
2 *EBorges@GGTrialLaw.com*  
3 GREENBERG GROSS LLP  
4 650 Town Center Drive, Suite 1700  
5 Costa Mesa, California 92626  
6 Telephone: (949) 383-2800  
7 Facsimile: (949) 383-2801

8 Attorneys for Party-in-Interest Erika Girardi

9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re

12 GIRARDI KEESE,

13 Debtor.

Case No. 2:20-bk-21022-BR

Chapter 7

**PARTY-IN-INTEREST ERIKA  
GIRARDI'S OMNIBUS WITHDRAWAL  
OF OBJECTIONS TO:**

**(1) CHAPTER 7 TRUSTEE'S MOTION  
FOR ORDER AUTHORIZING THE  
TRANSITION OF THE ESTATE'S  
INTEREST IN THE NFL CONCUSSION  
LITIGATION TO GOLDBERG PERSKY  
WHITE P.C. FREE AND CLEAR OF  
LIENS, CLAIMS AND INTERESTS  
PURSUANT TO 11 U.S.C. § 363; AND**

**(2) CHAPTER 7 TRUSTEE'S MOTION  
FOR ORDER AUTHORIZING THE  
TRANSITION AND ASSIGNMENT OF  
THE ESTATE'S INTEREST IN THE  
MESH LITIGATION TO NADRICH &  
COHEN LLP AND THE OSHMAN FIRM,  
LLC FREE AND CLEAR OF LIENS,  
CLAIMS AND INTERESTS PURSUANT  
TO 11 U.S.C. § 363**

**[Related to ECF Nos. 389, 428, 445 and 481]**

Date: August 10, 2021  
Time: 2:00 p.m.  
Ctm: 1668  
255 E. Temple Street  
Los Angeles, CA 90012

Judge: Hon. Barry Russell

**PARTY-IN-INTEREST ERIKA GIRARDI'S OMNIBUS WITHDRAWAL OF OBJECTIONS TO MOTIONS FOR  
ORDERS AUTHORIZING TRANSITION OF ESTATE'S INTERESTS IN THE NFL CONCUSSION LITIGATION  
AND MESH LITIGATION PURSUANT TO 11 U.S.C. § 363**

**TO THE HONORABLE COURT, ALL PARTIES IN INTEREST, AND THEIR  
ATTORNEYS OF RECORD:**

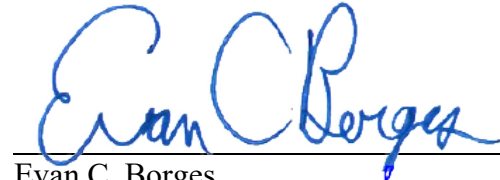
PLEASE TAKE NOTICE that, after reviewing information received from the chapter 7 trustee under the terms of the parties' negotiated Non-Disclosure Agreement on August 4, 2021, Party-in-Interest Erika Girardi hereby withdraws her (1) *Objections to the Chapter 7 Trustee's Motion for Order Authorizing the Transition and Assignment of the Estate's Interest in the NFL Concussion Litigation to Goldberg Persky White P.C. Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. § 363* (ECF No. 445), and (2) *Objections to the Chapter 7 Trustee's Motion for Order Authorizing the Transition and Assignment of the Estate's Interest in the Mesh Litigation to Nadrich & Cohen LLP and The Oshman Firm, LLC, Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. § 363* (ECF No. 481).

DATED: August 9, 2021

Respectfully submitted,

GREENBERG GROSS LLP

By:



Evan C. Borges

Attorneys for Party-in-Interest Erika Girardi

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 1700  
Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **PARTY-IN-INTEREST ERIKA GIRARDI'S OMNIBUS WITHDRAWAL OF OBJECTIONS TO: (1) CHAPTER 7 TRUSTEE'S MOTION FOR ORDER AUTHORIZING THE TRANSITION OF THE ESTATE'S INTEREST IN THE NFL CONCUSSION LITIGATION TO GOLDBERG PERSKY WHITE P.C. FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. § 363; AND (2) CHAPTER 7 TRUSTEE'S MOTION FOR ORDER AUTHORIZING THE TRANSITION AND ASSIGNMENT OF THE ESTATE'S INTEREST IN THE MESH LITIGATION TO NADRICH & COHEN LLP AND THE OSHMAN FIRM, LLC FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. § 363**

will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **August 9, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:



Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On **August 9, 2021** I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.



Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **August 9, 2021**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.



Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 9, 2021  
Date

Cheryl Winsten  
Printed Name

  
Signature

**In re GIRARDI KEESE**  
Case No. 2:20-bk-21022-BR  
U.S.B.C. Central District of California  
Los Angeles Division

**1. SERVED VIA NOTICE OF ELECTRONIC FILING (NEF):**

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Kyra E Andrassy** kandrassy@swelawfirm.com,  
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Rafey Balabanian** rbalabanian@edelson.com, docket@edelson.com
- **Michelle Balady** mb@bedfordlg.com, leo@bedfordlg.com
- **Ori S Blumenfeld** Ori@MarguliesFaithLaw.com,  
Helen@MarguliesFaithLaw.com;Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com
- **Evan C Borges** eborges@ggtriallaw.com, cwinsten@ggtriallaw.com
- **Richard D Buckley** richard.buckley@arentfox.com
- **Marie E Christiansen** mchristiansen@vedderprice.com,  
ecfladocket@vedderprice.com,marie-christiansen-4166@ecf.pacerpro.com
- **Jennifer Witherell Crastz** jcrastz@hrhlaw.com
- **Ashleigh A Danker** Ashleigh.danker@dinsmore.com,  
SDCMLFiles@DINSMORE.COM;Katrice.ortiz@dinsmore.com
- **Clifford S Davidson** csdavidson@swlaw.com, jlanglois@swlaw.com;cliff-davidson-7586@ecf.pacerpro.com
- **Lei Lei Wang Ekvall** lekvall@swelawfirm.com,  
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Richard W Esterkin** richard.esterkin@morganlewis.com
- **Timothy W Evanston** tevanston@swelawfirm.com,  
gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com,  
Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- **James J Finsten** , jimfinsten@hotmail.com
- **Alan W Forsley** alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy.flores@flpllp.com

- 1 • **Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- 2 • **Andrew Goodman** agoodman@andyglaw.com,  
3 Goodman.AndrewR102467@notify.bestcase.com
- 4 • **Suzanne C Grandt** suzanne.grandt@calbar.ca.gov, joan.randolph@calbar.ca.gov
- 5 • **Steven T Gubner** sgubner@bg.law, ecf@bg.law
- 6 • **Marshall J Hogan** mhogan@swlaw.com, knestuk@swlaw.com
- 7 • **Sheryl K Ith** sith@cookseylaw.com, sith@ecf.courtdrive.com
- 8 • **Razmig Izakelian** razmigizakelian@quinnemanuel.com
- 9 • **Lillian Jordan** ENOTICES@DONLINRECANO.COM,  
10 RMAPA@DONLINRECANO.COM
- 11 • **Lewis R Landau** Lew@Landaunet.com
- 12 • **Daniel A Lev** dlev@sulmeyerlaw.com,  
13 ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com
- 14 • **Elizabeth A Lombard** elombard@zwickerpc.com, bknotices@zwickerpc.com
- 15 • **Craig G Margulies** Craig@MarguliesFaithlaw.com,  
16 Vicky@MarguliesFaithlaw.com;Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithl  
17 aw.com
- 18 • **Peter J Mastan** peter.mastan@dinsmore.com,  
19 SDCMLFiles@dinsmore.com;Katrice.ortiz@dinsmore.com
- 20 • **Edith R. Matthai** ematthai@romalaw.com, lrobie@romalaw.com
- 21 • **Kenneth Miller** kmiller@pmcos.com, efilings@pmcos.com
- 22 • **Elissa Miller (TR)** CA71@ecfcbis.com,  
23 MillerTrustee@Sulmeyerlaw.com;C124@ecfcbis.com;ccaldwell@sulmeyerlaw.com
- 24 • **Eric A Mitnick** MitnickLaw@aol.com, mitnicklaw@gmail.com
- 25 • **Scott H Olson** solson@vedderprice.com, scott-olson-  
26 2161@ecf.pacerpro.com,ecfsfdocket@vedderprice.com,nortega@vedderprice.com
- 27 • **Carmela Pagay** ctp@lnbyb.com
- 28 • **Leonard Pena** lpena@penalaw.com,  
penasomaecf@gmail.com;penalr72746@notify.bestcase.com
- **Michael J Quinn** mquinn@vedderprice.com, ecfladocket@vedderprice.com,michael-  
quinn-2870@ecf.pacerpro.com
- **David M Reeder** david@reederlaw.com, secretary@reederlaw.com

- **Ronald N Richards** ron@ronaldrichards.com, morani@ronaldrichards.com
- **Kevin C Ronk** Kevin@portilloronk.com, Attorneys@portilloronk.com
- **William F Savino** wsavino@woodsoviatt.com, lherald@woodsoviatt.com
- **Kenneth John Shaffer** johnshaffer@quinnemanuel.com
- **Richard M Steingard** , awong@steingardlaw.com
- **Philip E Strok** pstrok@swelawfirm.com,  
gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Boris Treyzon** jfinnerty@actslaw.com, sgonzales@actslaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Eric D Winston** ericwinston@quinnemanuel.com
- **Christopher K.S. Wong** christopher.wong@arentfox.com, yvonne.li@arentfox.com
- **Timothy J Yoo** tjy@lnbyb.com

**2. SERVED BY UNITED STATES MAIL:**

**Debtor:**

Girardi Keese  
1126 Wilshire Blvd  
Los Angeles, CA 90017

ABIR COHEN TREYZON SALO, LLP, a California limited liability partnership (ACTS)  
16001 Ventura Boulevard, Suite 200  
Encino, CA 91436

Donlin, Recano & Company  
6201 15th Ave  
Brooklyn, NY 11219

IDiscovery Solutions  
535 Anton Blvd Ste 850  
Costa Mesa, CA 92626

James W Spertus  
Spertus Landes & Umhoffer LLP  
1990 South Bundy Dr Ste 705  
Los Angeles, CA 90025

Neil Steiner  
Steiner & Libo, Professional Corp  
11845 W. Olympic Blvd Ste 910W  
Los Angeles, CA 90064

1 Boris Treyzon Esq  
16001 Ventura Blvd., Suite 200  
2 Encino, CA 91436

3 Andrew W Zepeda  
4 Lurie, Zepeda, Schmalz, Hogan & Martin  
1875 Century Park East Ste 2100  
5 Los Angeles, CA 90067

6  
7 **3. SERVED BY PERSONAL DELIVERY:**

8 **U.S. Bankruptcy Court:**

U.S. Bankruptcy Court  
Hon. Barry Russell  
9 255 E. Temple Street, Suite 1660  
10 Los Angeles, CA 90012